

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

K.W.,	)	
	)	
Plaintiff,	)	CIVIL ACTION
	)	
v.	)	FILE NO.: 1:25-CV-03201-TRJ
	)	
JANKI MOTEL, INC.,	)	
	)	
Defendants.	)	
_____	)	

**CONSENT MOTION TO EXTEND TIME FOR DEFENDANT JANKI  
MOTEL, INC. TO ANSWER OR OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

COMES NOW the Defendant Janki Motel, Inc., and files this, its Consent Motion to Extend Time for Defendant Janki Motel, Inc., to Answer or Otherwise Respond to the Complaint through and including July 24, 2025.

The current deadline for Defendants to answer or otherwise respond to the Complaint for Damages is July 3, 2025. However, defense counsel needs additional time to obtain information and materials to answer or respond to the complaint. Defense counsel has consulted with counsel for plaintiff, who consents to the requested extension.

Defendant respectfully requests that the Court issue an Order extending the deadline for Defendant to answer or otherwise respond to the Complaint for Damages through and including July 24, 2025.

A proposed Order is attached for the Court's convenience.

This 3<sup>rd</sup> day of July, 2025.

**FREEMAN MATHIS & GARY, LLP**

*/s/ Jennifer C. Adair*

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Jennifer C. Adair

Georgia Bar No. 001901

[JAdair@fmglaw.com](mailto:JAdair@fmglaw.com)

Emma J. Fennelly

Georgia Bar No. 610587

[Emma.fennelly@fmglaw.com](mailto:Emma.fennelly@fmglaw.com)

*Attorneys for Janki Motel, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing **CONSENT MOTION TO EXTEND TIME FOR DEFENDANT JANKI MOTEL, INC., TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND PROPOSED ORDER** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF participants.

Counsel of record are:

Anderson Tate & Carr  
Patrick J. McDonough  
[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)  
Jonathan S. Tonge  
[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)  
Jennifer M. Webster  
[jwebster@atclawfirm.com](mailto:jwebster@atclawfirm.com)  
One Sugarloaf Centre  
1960 Satellite Blvd., Suite 4000  
Duluth, Georgia 30097  
Counsel for Plaintiff

This 3<sup>rd</sup> day of July, 2025.

**FREEMAN MATHIS & GARY, LLP**

/s/ Jennifer C. Adair

Jennifer C. Adair  
Georgia Bar No. 001901

[JAdair@fmglaw.com](mailto:JAdair@fmglaw.com)

Emma J. Fennelly  
Georgia Bar No. 610587

[Emma.fennelly@fmglaw.com](mailto:Emma.fennelly@fmglaw.com)

*Attorneys for Janki Motel, Inc.*

**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing document has been prepared in accordance with L.R. 5.1 using Century Schoolbook font, 13-point.

**FREEMAN MATHIS & GARY, LLP**

*/s/ Jennifer C. Adair*

Jennifer C. Adair

Georgia Bar No. 001901

[JAdair@fmglaw.com](mailto:JAdair@fmglaw.com)

Emma J. Fennelly

Georgia Bar No. 610587

[Emma.fennelly@fmglaw.com](mailto:Emma.fennelly@fmglaw.com)

*Attorneys for Janki Motel, Inc.*